

CUAUHTEMOC ORTEGA (Bar No. 257443)
Federal Public Defender
DAVID I. WASSERMAN (Bar No. 275987)
(E Mail: David.Wasserman@fd.org)
Deputy Federal Public Defender
321 East 2nd Street
Los Angeles, California 90012-4202
Telephone: (213) 894-2854
Facsimile: (213) 894-0081

Attorneys for Defendant
ANDERSON BONILLA-ECHEGOYEN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDERSON BONILLA-ECHEGOYEN,

Defendant.

Case No. CR 18-876-JAK

**STIPULATION TO CONTINUE THE
STATUS CONFERENCE SET FOR
MARCH 16, 2023**

Plaintiff, United States of America, by and through its attorney of record, Assistant United States Attorney J. Jamari Buxton, and Defendant Anderson Bonilla-Echegoyen, by and through his attorney of record, Deputy Federal Public Defender David I. Wasserman, hereby stipulate and request that the status conference, presently set for March 16, 2023, be continued to May 11, 2023, at a time convenient for the Court. This stipulation is based on the following facts, which the parties believe demonstrate good cause for the requested continuance.

1. On February 21, 2023, defense counsel filed a Request for an Order setting a status conference in this case so that Mr. Bonilla-Echegoyen could address the Court regarding the terms and conditions of his Supervised Release. Dkt. 120. On February 23, 2023, the Court set a status conference for March 16, 2023. Dkt. 121.

//

1 2. On March 13, 2023, defense counsel learned that Mr. Bonilla-Echegoyen
2 was admitted to the hospital. On March 14, 2023, defense counsel learned that Mr.
3 Bonilla-Echegoyen underwent surgery for an injury to his Achille's tendon and was
4 discharged from the hospital.

5 3. Upon information and belief, defense counsel does not believe that Mr.
6 Bonilla-Echegoyen will be able to attend the status conference currently set for March
7 16, 2023. Mr. Bonilla-Echegoyen has requested that the Court vacate the status
8 conference date.

9 4. The government does not object to the request for a continuance.

10 5. Based on the foregoing, the parties stipulate and move this Court for a
11 continuance of the status conference date to May 11, 2023, or a later date convenient
12 with the Court.

13 Respectfully submitted,

14 CUAUHTEMOC ORTEGA
15 Federal Public Defender

16 DAVID I. WASSERMAN
17 Deputy Federal Public Defender

18 DATED: March 15, 2023

19 By /s/ David I. Wasserman

20 Deputy Federal Public Defender
21 Attorney for A. BONILLA-ECHEGOYEN

22 DATED: March 15, 2023

23 E. MARTIN ESTRADA
24 United States Attorney

25 By /s/ J. Jamari Buxton (email authorization)

26 Assistant United States Attorney
27 Attorney for Plaintiff
28 UNITED STATES OF AMERICA